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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	
)	Case No.: 2:15-mj-00572-CWH
Plaintiff,)	
)	STIPULATION TO CONTINUE
vs.)	PRELIMINARY HEARING
)	(First Request)
)	
JOHNNY MOORE, AKA JOHN MOORE,)	
JR., AKA "STEVE", AND)	
JAZZMIN DAILEY, AKA JAZZIEE,)	
)	
Defendants.)	

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United States Attorney; Allison L. Herr, Special Assistant United States Attorney, counsel for the United States of America and Raquel Rene L. Valladares, Federal Public Defender, and Raquel Lazo, Assistant Federal Public Defender, counsel for defendant JOHNNY MOORE, and Benjamin Durham, counsel for defendant JAZZMIN DAILEY, that the preliminary hearing date in the above-captioned matter, currently scheduled for July 21, 2015 at 4:00 pm, be vacated and continued for a period of two weeks to a date and time to be set by this Honorable Court.

This Stipulation is entered into for the following reasons:

1. The parties wish to pursue pre-indictment negotiations, which if successful would obviate the need for a preliminary hearing.

2. The additional time requested is not sought for the purposes of delay, but to allow counsel sufficient time to pursue a speedy resolution.

3. The parties agree to the continuance, and a denial of this request could result in a miscarriage of justice.

4. The defendants are in custody but do not object to a short continuance.

5. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code §3161(h)(7)(A), considering the factors under Title 18, United States Code §3161(h)(7)(B) and § 3161(h)(7)(B)(iv).

6. This is the first request to continue the preliminary hearing.

DATED this 16th day of July, 2015.

DANIEL G. BOGDEN
United States Attorney

RENE L. VALLADARES
Federal Public Defender

By: /s/ Allison Herr
ALLISON L. HERR
Special Assistant United States Attorney

By: /s/ Raquel Lazo
RAQUEL LAZO
Assistant Federal Public Defender
Attorney for Johnny Moore

By: /s/ Benjamin C. Durham
BENJAMIN C. DURHAM
Attorney for Jazzmin Dailey

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHNNY MOORE, AKA JOHN MOORE,
JR., AKA "STEVE", AND
JAZZMIN DAILEY, AKA JAZZIEE,

Defendant.

Case No.: 2:15-mj-00572-CWH

FINDINGS OF FACT, CONCLUSION OF
LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

1. The parties wish to pursue pre-indictment negotiations, which if successful would obviate the need for a preliminary hearing.

2. The additional time requested is not sought for the purposes of delay, but to allow counsel sufficient time to pursue a speedy resolution.

3. The parties agree to the continuance, and a denial of this request could result in a miscarriage of justice.

4. The defendants are in custody but do not object to a short continuance.

5. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code §3161(h)(7)(A), considering the factors under Title 18, United States Code §3161(h)(7)(B) and § 3161(h)(7)(B)(iv).

